

REDACTED VERSION

Exhibit 1

Veronica Gutierrez, et al. v. Wells Fargo, et al.
Case No.: C 07-05923 WHA

EXHIBIT “1”
REDACTED VERSION

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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Attorneys for Defendants
WELLS FARGO BANK, N.A. and
WELLS FARGO & CO.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

VERONICA GUTIERREZ, TIM FOX,
ERIN WALKER and WILLIAM SMITH,
as individuals, and on behalf of all others
similarly situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY; WELLS
FARGO BANK, N.A.; and DOES 1 through
125,

Defendants.

Civil Case No.: CV-07-5923 WHA

**WELLS FARGO BANK, N.A.'S
RESPONSE TO PLAINTIFF ERIN
WALKER'S SPECIAL
INTERROGATORIES (SET ONE)
[Nos. 1-23]**

REQUESTING PARTY: Plaintiff ERIN WALKER

RESPONDING PARTY: Defendant WELLS FARGO BANK, N.A.

SET NO.: One (Nos. 1-23)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendant Wells
Fargo Bank, N.A. ("Wells Fargo Bank" or "the Bank") hereby responds and objects to plaintiff
Erin Walker's Special Interrogatories (Set One) as follows.

These responses are designated "**CONFIDENTIAL**" under the terms of the
Stipulated Protective Order entered in this case.

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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13 **SPECIAL INTERROGATORY NO. 2:**

14 Please state the total number of CUSTOMERS incurring overdraft charges for
15 transactions for each year from 2003-2007.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

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CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

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SPECIAL INTERROGATORY NO. 5:

For those CUSTOMERS identified in response to Special Interrogatory No. 2, please state the total amount of overdraft fees assessed for each year from 2003-2007.

RESPONSE TO SPECIAL INTERROGATORY NO. 5:

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CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

SPECIAL INTERROGATORY NO. 7:

Of those CUSTOMERS identified in response to Special Interrogatory No. 2, please provide the number of MULTIPLE TRANSACTION CUSTOMERS for each year from 2003-2007.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

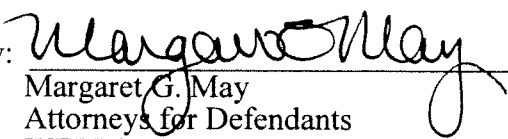
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CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

REDACTED

DATED: May 8, 2008

COVINGTON & BURLING LLP

By: 
Margaret G. May
Attorneys for Defendants
WELLS FARGO BANK, N.A. and
WELLS FARGO & CO.

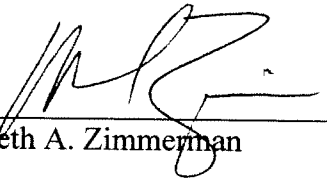
VERIFICATION

I, Kenneth A. Zimmerman, declare and state:

I am the Executive Vice President of the Consumer Deposit Group of Wells Fargo Bank, N.A., and I am authorized to make this verification on its behalf. I have read Wells Fargo Bank, N.A.'s Response to Plaintiff Erin Walker's Special Interrogatories (Set One) and certify that the facts contained therein are either true as of my own knowledge or true on the basis of my information and belief.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 5th, 2008, in Orlando, Florida.


Kenneth A. Zimmerman